

EXHIBIT B

Population within KDUT-FM3 Contour (Ogden)

Brigham City (18,709)

Mantua (756)

Perry (3,889)

Willard (1,747)

South Willard* (586)

North Ogden (17,682)

Pleasant View (7,052)

Plain City (5,288)

Farr West (5,335)

Marriott-Slaterville (1,537)

Ogden (82,865)

Huntsville (653)

West Haven (8,357)

Riverdale (8,126)

Roy (35,672)

Hooper* (5,665)

South Ogden (15,891)

South Weber (6,167)

Sunset (4,945)

Clinton (19,855)

Clearfield (27,851)

West Point (9,001)

Syracuse (22,195)

Layton (65,514)

(* Denotes CDP)

EXHIBIT C

Population within KDUT-FM2 Contour (Salt Lake City)

Farmington (17,217) Centerville (15,270) West Bountiful (5,337) Bountiful (44,473) Woods Cross (8,705) North Salt Lake (13,446) Salt Lake City (181,698) Magna* (22,770) West Valley City (123,447) Canyon Rim* (10,428) South Salt Lake (21,607) Millcreek* (30,377) East Millcreek* (21,385) Mount Olympus* (7,103) Taylorsville (58,785) Kearns* (33,659) Мигтау (46,201) Oquirrh* (10,390) Cottonwood West* (18,727) Holladay (25,676) Midvale (28,129) Cottonwood Heights* (35,418) Little Cottonwood Creek Valley* (7,221) Sandy (96,660) West Jordan (104,447) South Jordan (51,131) Herriman (17,689) Riverton (39,751) Bluffdale (8,016) Draper (42,317) Alpine (9,885)

(* Denotes CDP)

Highland (16,189) Lehi (46,802)

EXHIBIT D

Population within KDUT-FM52 Contour (Provo)

American Fork (27,064)
Pleasant Grove (33,798)
Lindon (10,466)
Vineyard (148)
Orem (93,250)
Provo (118,581)
Palmyra* (485)
Lake Shore* (755)
Springville (28,520)
Spanish Fork (31,538)

(* Denotes CDP)

EXHIBIT E

Ogden booster

Total Population: 257,686

White: 214,675 Black: 3,673 Hispanic: 29,965 Native American: 1,602 Asian: 3,578 Pacific Islander: 407 Mixed Race: 3,579 Other: 207

Salt Lake City booster

Total Population: 983,981

White: 807,523 Black: 8,730 Hispanic: 109,569 6,780 Native American: Asian: 23,510 Pacific Islander: 11,145 Mixed Race: 15,751 Other: 973

Provo booster

Total Population: 308,005

White: 272,198 Black: 943 Hispanic: 22,989 Native American: 1,695 Asian: 3,669 Pacific Islander: 1,965 Mixed Race: 4,253 293 Other:

VALLACHMENT B

FEDERAL COMMUNICATIONS COMMISSION 445 TWELFTH STREET SW WASHINGTON DC 20554

MEDIA BUREAU AUDIO DIVISION APPLICATION STATUS: (202) 418-2730 HOME PAGE: www.fcc.gov/mb/audio/ ENGINEER: CHARLES N. (NORM) MILLER
TELEPHONE: (202) 418-2767
FACSIMILE: (202) 418-1410
E-MAIL: charles.miller@fcc.gov

March 29, 2010

Francisco R. Montero, Esq. Fletcher, Heald & Hildreth, P.L.C. 1300 North 17th Street, 11th Floor Arlington, Virginia 22209-3801

In re: Bustos Media of Utah License, LLC KDUT (FM), Randolph, Utah Facility Identification Number: 88272 Application for Experimental Authorization

Dear Counsel:

The staff has before it a request for an Experimental Authorization, filed March 9, 2010, on behalf of Bustos Media of Utah License, LLC ("BMU"), licensee of Station KDUT(FM), Randolph, Utah', and several associated FM Booster Stations². BMU proposes to conduct experimental operations to determine the feasibility of broadcasting independent, targeted messages on the FM Booster stations. BMU proposes to simultaneously broadcast different noncommercial announcements, targeted to specific, diverse audiences, on each of the booster stations. BMU proposes to use proprietary technology provided by GEO Spots, LLC, which will allow different announcements to be placed on each of the boosters in a synchronized time sequence. Other than the foregoing, no changes to the authorized technical facilities are contemplated. BMU states that the experimental broadcasts will be conducted over a 30-day period.

Our review indicates that the proposed experimental operation meets the requirements of Section 73.1510 of the Commission's rules and that the proposed experimental operation is not likely to result in interference to any other station. Although some intrasystem interference is to be expected from the experimental operation, we believe that BMU will act in its own self-interest to minimize any detrimental effect on its listeners. We find that the Public Interest would be served through the collection of data on the feasibility of transmitting independent, targeted announcements on FM Boosters, which could be used in support of a Petition for Rule Making to modify the Commission's Rules to permit the use of such transmissions. We believe that, in order to provide for setup and preliminary testing in addition to the proposed 30-day experimentation, a term of 60 days is appropriate.

¹ KDUT is licensed for operation on Channel 272C (102.3 MHz), with effective radiated power of 89 kilowatts (H only) and antenna height above average terrain of 647 meters.

² KDUT-FM1, Bountiful, UT; KDUT-FM2, Salt Lake City, UT; KDUT-FM3, Ogden, UT; KDUT-FM5, Provo, UT.

Accordingly, the request for Experimental Authorization IS GRANTED. Station KDUT may transmit independent, noncommercial announcements on its associated FM Booster Stations as described above. Limited waiver of 47 C.F.R. Section 74.1231(h) is granted, only to the extent necessary for the proposed experimentation. BMU shall employ whatever means are necessary to prevent excessive exposure of workers or the public to radio frequency radiation, pursuant to Section 1.1310. Within 60 days following completion of the experimental operation authorized herein, BMU shall file a full report of the research, experimentation and results with the Commission, pursuant to Section 73.1510(d). The authority granted herein does not convey or imply any authority for continued operation beyond the expiration date below. Any construction undertaken pursuant to this authority is entirely at BMU's own risk. This authority may be modified or cancelled by the FCC at any time without prior notice or right to hearing.

This authorization expires on May 29, 2010.

Sincerely,

Charles N. Miller, Engineer

Audio Division Media Bureau

cc: Bustos Media of Utah License, LLC
Aaron P. Shainis, Esq. (Counsel for GEO Spots, LLC)

VALLACHMENT C

Shainis & Peltzman, Chartered

Counselors at Liam

Auron P. Shainis aaron@s-plaw.com Lee T. Peltzman lee@s-plaw.com Suite 240 1850 M Street, N.M. Washington, A.C. 20036

(202) 293-0011 Fax (202) 293-0810 e-mail: slpainispelteman@s-plain.com July 29, 2010 Special Counsel Stephen (I. Tieckar steve@s-plaw.com

Of Counsel
William H. AuRoss, 111
bill @s-plaw.com
Robert I. Keller
bob@s-plaw.com

VIA HAND DELIVERY

Marlene H. Dortch, Esq.
Secretary
Federal Communications Commission
Portals II – 12th Street Lobby
Filing Counter – TW-A325
445 12th Street, SW
Washington, D.C. 20554

FILED/ACCEPTED

JUL 29 2010

Federal Communications Commission Office of the Secretary

Re:

KDUT(FM), Randolph, Utah Experimental Test Result

Dear Ms. Dortch:

Lazer Spots, LLC (formerly GEO Spots, LLC) submits the following report that was done pursuant to the Commission's March 29, 2010 issuance of an experimental authorization to be used with the above-referenced station. If there are any questions with respect to this matter, please communicate with the undersigned.

Sincerely yours

Aaron P. Shainis Counsel for

Lazer Spots, LLC

Report to the FCC on the Lazer Spots, LLC Bustos Media of Utah License, LLC KDUT(FM) Experimental Test Report

Lazer Spots, LLC 737 North Michigan Avenue Suite 2350 Chicago, IL 60611

July 15, 2010

Table of Contents

۱.	EXECUTIVE SUMMARY	. 3
ļ	BACKGROUND FOR TEST AUTHORITY	. 3
(GENERAL DESCRIPTION OF TEST	. 3
	Table One: Booster Locations	. 4
(CONCLUSION	. 4
II.	SUMMARY OF TEST RESULTS	. 4
III.	FIELD TEST PROCEDURE	. 6
	BOOSTER LOCATIONS	. 6
	Table Two: Booster Locations	. 6
	Figure One: North Booster Locations	. 6
	Figure Two: South Booster Locations	. 7
	DRIVE TEST LOCATIONS	. 7
	Figure Three: Ogden Test Locations	. 8
	Figure Four: Bountiful Test Locations	. 8
	Figure Five: Salt Lake City Test Locations.	. 9
	Figure Six: Provo Test Locations	. 9
	Table Three: Booster Naming Convention	10
	Figure Seven: Audemat FM-MC4 TM	11
	Figure Eight: GoldenEar TM SLC Plot	12
	Figure Nine: GoldenEar™ Signal Display	13
	Figure Ten: Test Vehicle	14
	Table Four: Non-Targeted Spot Measured Parameters	15
	Table Five: Targeted Spot Measured Parameters	15
i۷.	RF ANALYSIS OF THE TEST AREA	16
	60 dBu CONTOURS	16
	Figure 11: Ogden Area Contour and Test Locations	17
	Figure 12: Bountiful Area Contour and Test Locations	17
	Figure 13: Salt Lake City Area Contour and Test Locations	18
	Figure 14: Provo Area Contour and Test Locations	18

	Table Six: Desired-to-Undesired Ratios	19
	Figure 15: Ogden Longley-Rice Coverage Area	20
	Figure 16: Bountiful Longley-Rice Coverage Area	20
	Figure 17: Salt Lake City Longley-Rice Coverage Area	21
	Figure 18: Provo Longley-Rice Coverage Area	21
V.	NETWORK INFRASTRUCTURE AND TARGETED SPOT INSERTION	22
١	VIMAX OVERLAY AND DISTRIBUTION NETWORK	22
	Figure 19: Current Audio and STL Distribution Network	22
7	THE LAZER SPOTS™ 'DBH CONTROL UNIT' (Patent Pending)	22
	Figure 20: Target Spot Audio and STL Distribution Network	24
	Figure 21: Targeted Spot Booster Site Implementation	24
	Figure 22: WiMax Overlay Distribution Studio-to-Booster Site Equipment	25
VI.	ANALYSIS AND RATING OF THE AUDIO AND EFFECTIVENESS OF TARGETED SPOT	
DE	LIVERY WITH BOOSTERS	25
P	AUDIO SAMPLE RECORDINGS	25
1	NON TARGETED (SIMULCAST) PSA AUDIO SPOT	26
7	ARGETED (NON-SIMULCAST) PSA AUDIO SPOTS	26
C	DBJECTIVE AUDIO ANALYSIS FOR NON-TARGETED/TARGETED SPOTS RESULTS	27
	Table Seven: ITU-R Grading Scales	27
	Table Eight: ITU-R Comparison Scales	28
	Table Nine: Objective Audio Test Results	28
VII.	APPENDIX ONE: AUDEMAT FM-MC4 CALIBRATION DATA	30
P	NTENNA CALIBRATION	30
	Figure 23: Antenna Calibration Curves	30
F	RECEIVER CALIBRATION	30
	Figure 24: RF Receiver Calibration Curves	31
VIII	. APPENDIX TWO: REFERENCE STANDARDS RELEVANT TO THIS REPORT	32
F	CC AUDIO DIVISION	32
i	NTERNATIONAL TELECOMMUNICATIONS UNION (ITU)	32
١	WORLDCAST SYSTEMS / AUDEMAT DIVISION MENTION REFERENCES	32

I. EXECUTIVE SUMMARY

BACKGROUND FOR TEST AUTHORITY

On March 9, 2010, Bustos Media of Utah License, LLC ("BMU"), the licensee of KDUT(FM), Randolph, Utah; KDUT-FM1, Bountiful, Utah; KDUT-FM2, Salt Lake City, Utah; KDUT-FM3, Ogden, Utah; and KDUT-FM5, Provo, Utah submitted a request for an experimental authorization (Attachment A). In that request, BMU, in conjunction with the assistance of Lazer Spots, LLC (formerly GEO Spots, LLC), sought Commission approval to allow it to utilize boosters associated with KDUT to originate limited programming. Specifically, the intent was to simultaneously broadcast of each of the aforementioned boosters different non-commercial announcements targeted to discreet audiences. The broadcasts were to be targeted to appeal to specific audiences encompassed within the booster's service areas. The proposal was for each of the boosters in question to concurrently broadcast a different non-commercial message.

On March 29, 2010, the Commission granted the experimental authorization (Attachment B). The authorization specified that "within 60 days following completion of the experimental operation authorized herein, BMU shall file a report of the research, experimentation and results with the Commission pursuant to Section 73.1510(d)."

On May 26, 2010, an additional 60 days was requested to complete the experimental broadcasts (Attachment C). On June 3, 2010 the Commission granted the request and extended the testing through August 3, 2010 (Attachment D).

GENERAL DESCRIPTION OF TEST

Conventionally planned FM broadcasting networks consist of transmitters with independent program signals on individual FM radio frequencies as allocated and regulated by the FCC. The allocation of the radio frequency for each transmitter and protected service and interference contours are defined by the FCC in Part 73 of Title 47 and FM Translator and Booster Rules in Part 74. Boosters are defined as transmitters which broadcast within Main station's coverage area (a "fill-in") on the same channel and frequency, and were created to allow FM stations to provide supplementary service to areas in which direct reception of radio service is unsatisfactory due to distance or intervening terrain barriers. Lazer Spots, LLC has developed a system that will allow an FM radio station to divide its signal into segments with the use of proprietary booster system design, audio and control switching, routing, hardware, software and implementation techniques. This new idea would allow the station to run different audio messages, such as Public Service Announcements (PSAs) on different booster transmitters simultaneously, thereby creating additional time capacity for such announcements. Lazer Spots[™] holds a patent pending application for "Equipment, System and Methodologies for Segmentation of Listening Area into Sub-Areas Enabling Delivery of Localized Auxiliary Information". The concept of adding FM boosters to an existing FM broadcast station within the protected service area of the main station and specifically designed for targeted messaging is an expertise of Lazer Spots, LLC. It allows the ability to target listeners with more local relevant information as well as free up valuable broadcast messaging time.

The KDUT broadcast system has four boosters covering four distinct areas: Ogden, Bountiful, Salt Lake City, and Provo, UT.

MAIN	KDUT	15' 55.00" N 110° 33' 20.0	00" W 89.00 kW ERP
BOUNTIFUL BOOSTER	KDUT-FM1	50" 5.00 " N 111" 52" 3.0	0 " W 0.099 kW ERP
SALT LAKE CITY BOOSTER	KDUT-FM2	48' 29.00" N 111" 53' 23.0	00" W 0.099 kW ERP
OGDEN BOOSTER	KDUT-FM3	09' 57.00" N 112° 00' 52.0	00" W 5.600 kW ERP
PROVO BOOSTER	KDUT-FM5	18' 0.00 " N 111° 38' 38.	00" W 0.099 kW ERP

Table One: Booster Locations

In the KDUT(FM) FCC defined service contour (60 dB μ V/m), the four boosters create four distinct coverage areas, in terms of RF isolation and segregated markets. Distinct Public Service Announcements (PSAs) were tested as each market area was broadcasting a distinct PSA spot at the same time.

The tests as presented in this report were performed in June 23-26 of 2010, after modifications to the broadcast audio distribution (within the studio and in the studio-to-transmitter (STL) links) system were made to implement the targeted messaging concept.

In terms of market test locations, it is well known that the Salt Lake City market is favorable with regards to implementation of boosters, to increase signal level due to terrain blockage and mitigate multipath interference due to reflections from the surrounding terrain. It is important to note that in the test of KDUT(FM), no modifications to the main KDUT(FM) broadcast transmitter nor to any of the four KDUT(FM) boosters were implemented to the effective radiated RF power, broadcast antennas or geographical locations. Given the favorable results obtained and presented in this report we believe this is a very significant actuality.

CONCLUSION

The results of the testing, which occurred on June 23-26 of 2010, demonstrate that not only is the concept technically feasible but it is also of great value to the future of terrestrial FM radio broadcasting. Specifically, different announcements were broadcast to separate and discreet listeners concurrently. The quality of the announcements was not impaired to any significant degree. The attached audio clips for each of the measurement locations are provided for subjective verification of these results.

II. SUMMARY OF TEST RESULTS

Conventionally planned broadcasting networks consist of transmitters with independent program signals and with individual radio frequencies. The allocation of the radio frequency for each transmitter and protected service and interference contours are defined by the FCC in Part 73 of Title 47 and FM Translator and Booster Rules in Part 74. Lazer Spots, LLC has developed a proprietary (Lazer SpotsTM) system and technology that will allow a broadcast FM radio station

to divide its signal into segments with the use of carefully engineered booster transmission points. This new concept would allow the broadcaster to run different audio messages, such as Public Service Announcements (PSAs) on different booster transmitters simultaneously, thereby creating additional time capacity for such announcements. It allows the ability to target their listeners with more specific (i.e. hyper-local) relevant information, as it increases valuable broadcast messaging time.

The Lazer SpotTM approach is considerably different from the conventional broadcast coverage enhancement-only approach in that the purpose is to broadcast specific Public Service Announcements (PSAs) to a specific geographical area and potentially demographical listening audience, for a limited amount of broadcast time. For example, in this test two or three 30 second Targeted spots were broadcast, three to four times per hour.

It is common for FM analog booster implementations to create some amount of interference. The Lazer SpotsTM proprietary system is designed to i) minimize interference in general using its patent pending design technology and software and routing capabilities, and ii) placing the simulcast interference areas that occur where there exists diminutive population counts and demographically determined non-listeners of the specific broadcast station. It is also important to point out that the overall benefit of the targeted messaging approach far outweighs the relatively small interference that occurs with booster implementations, especially when the design is such that it is engineered to minimize this occurrence to the listening public.

In the KDUT(FM) test, the submitted audio clips were recorded in the field from 6/23/2010 to 6/25/2010. Audio information was collected at 20 geographical locations and described in detail later in this report. At each of the 20 test locations, a measurement of the 'Non-Targeted', normal simulcast audio were made for a single PSA spot. This is referred to as the reference PSA spot and used as a comparative reference to the 'Targeted' spot. For the targeted-test mode, distinct spots were broadcast on each adjacent booster. These spots were not in simulcast synchronization mode, as normally would be the case. The goal was to monitor and analyze the audio at the 20 test locations for quality of reception as compared to the Non-Targeted PSA spot.

The results in this report indicate an objective 'before and after' analysis of the Non-Targeted and Targeted Audio spots. The audio clips for each of the measurement locations is also provided with this report for subjective analysis, which correlate very well based on listener feedback. In fact, under no case could the Non-Targeted audio be considered imperceptible, as defined in this report under ITU-R definitions. In fact, for the measured tests the average statistical difference between the objective audio quality measurements for the Non-Targeted and Targeted Audio spots are a mere 1%. If the guidelines for quality measurements of rounding to the nearest tenth of a decimal were made as suggested by the ITU-R¹, then NO objective perceptible difference is found on average for the KDUT-FM test. This is exciting, ground breaking news as Lazer Spots, LLC did not modify the commercially operating RF broadcast transmission parameters of KDUT-FM as previously mentioned.

¹ RECOMMENDATION ITU-R BS.1284-1*General methods for the subjective assessment of sound quality

III. FIELD TEST PROCEDURE

BOOSTER LOCATIONS

The KDUT broadcast system has four boosters covering four distinct areas: Ogden, Bountiful, Salt Lake City, and Provo, UT. The tests presented in this report were performed from June 23-26 of 2010, after modifications to the broadcast audio distribution (within the studio and in the studio-to-transmitter (STL) links) system were made to implement the targeted messaging concept.

MAIN	KDUT	41° 15' 55.00" N	110° 33' 20.00" W	89.00 kW ERP
BOUNTIFUL BOOSTER	KDUT-FM1	40° 50' 5.00 " N	111° 52' 3.00 " W	0.099 kW ERP
SALT LAKE CITY BOOSTER	KDUT-FM2	40° 48' 29.00" N	111° 53' 23.00" W	0.099 kW ERP
OGDEN BOOSTER	KDUT-FM3	41° 09' 57.00" N	112° 00' 52.00" W	5.600 kW ERP
PROVO BOOSTER		40° 18' 0.00 " N	111° 38' 38.00" W	0.099 kW ERP

Table Two: Booster Locations

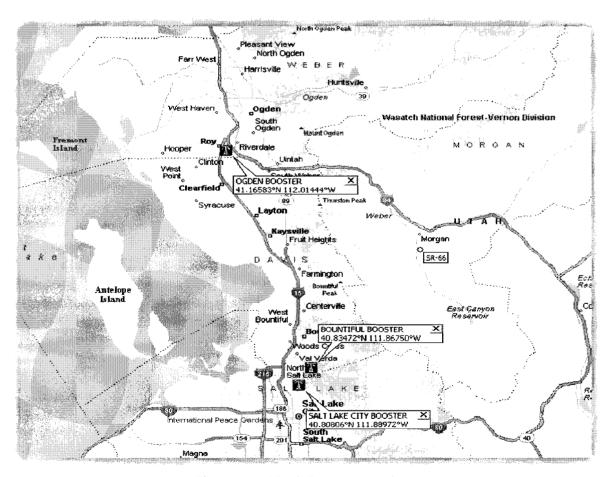


Figure One: North Booster Locations

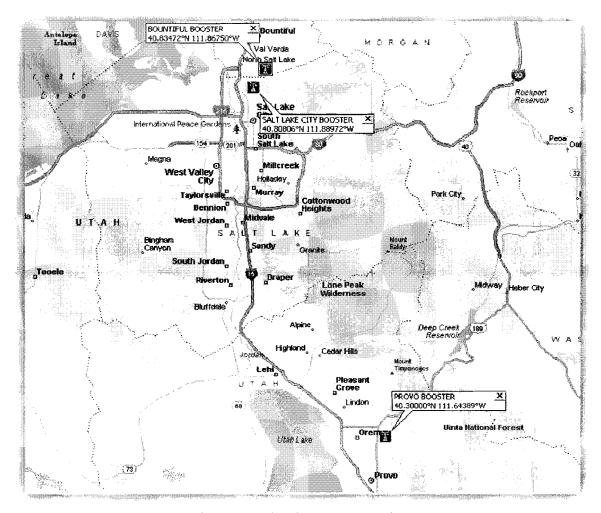


Figure Two: South Booster Locations

DRIVE TEST LOCATIONS

Preliminary testing occurred on 6/1/2010 to 6/7/2010 to determine appropriate test locations and drive distances between test locations. It is important to point out that 15 minutes or 30 minutes elapsed between the PSA spots, so drive distances had to be determined-typically 5-10 miles apart, and compensated by roads, construction delays, and alternate routes for high traffic or accidents. A typical test location was in an empty large parking lot with no close obstructions.

The 20 test locations were made in a stationary vehicle with sophisticated RF receiver and measurement software. Extreme care was taken to measure the Non-Targeted PSA spot and Targeted PSA spot (before and after) while the vehicle was within 1-1.5 meters each time, with the same vehicle orientation. With a few exceptions as discussed in the RF analysis section, the results were shown to be very close from a RF signal level measurement for each location. The coverage areas are divided into four maps shown below. This is based on the dominant coverage area for each of the four boosters under study.